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BOSCH, KUHR, DUGDALE, JAN 22 PM 12:24
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Attorneys for Plaintiff

MONTANA TWELFTH JUDICIAL DISTRICT COURT, HILL COUNTY

TERRY PARSONS,

Plaintiff,

and

ADM/CHS, LLC.,

Defendant.

Cause No. DV-08-249

COMPLAINT AND JURY DEMAND

CV-09-11-GF-RKS

COMES NOW the Plaintiff, Terry Parsons, and for his claim for relief alleges as follows:

I.

At all times pertinent hereto Plaintiff was a resident of Hill County, Montana.

II.

Defendant, ADM/CHS, LLC. is a Delaware Limited Liability Company with its principal offices located in Inver Grove Heights, Minnesota. Defendant is authorized to conduct business in the State of Montana and has an office located in Havre, Hill County, Montana.

1 III.

2 Plaintiff was employed with Defendant from May 1, 2005 until
3 he was terminated by the Defendant on January 11, 2008, a period of
4 more than 2 years.

5 IV.

6 On or about January 11, 2008, without good cause and contrary
7 to its own written personnel policies, the Defendant wrongfully
8 dismissed Plaintiff and terminated his employment with the
9 Defendant.
10

11 V.

12 The Defendant failed to notify or inform the Plaintiff, within
13 7 days of his termination, of the existence of any written internal
14 procedures under which he could appeal his termination within the
15 Defendant's organizational structure and failed to supply the
16 Plaintiff with a copy of any written internal procedures
17

18 VI.

19 As a direct and legal result of the wrongful discharge,
20 Plaintiff sustained substantial economic losses, including loss of
21 past and future income, loss of fringe benefits, including but not
22 limited to retirement and health care benefits, attorney's fees and
23 litigation expenses, all to his detriment and damage in an amount
24 to be determined at trial.
25

1 WHEREFORE, Plaintiff demands judgment against the Defendant as
2 follows:

3 1. For lost wages and fringe benefits, together with
4 interest.

5 2. For costs and expenses; and


6 3. Any and all other relief which the Court deems proper
7 under the circumstances.
8

9 DEMAND FOR JURY TRIAL

10 Plaintiff demands a trial by jury.

11
12 Date this 30th day of December, 2008.

13 BOSCH, KUHR, DUGDALE,
14 MARTIN & KAZE, PLLP

15 By 
16 P.O. Box 7152
Havre, MT 59501
Attorneys for Plaintiff